

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

United States Courts
Southern District of Texas
FILED

UNITED STATES OF AMERICA

§
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§
§
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§
§

v.

[REDACTED]
MELIK B. EBRAHIM (2)
[REDACTED]

SEALED

David J. Bradley, Clerk of Court

No. 4:19CR271

Judge Jordan

4:20-MJ-0076

UNSEALED Upon Arrest

REC'D
DEC 11 2019

Clark, U.S. District Court
Texas Eastern

FIRST SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846

(Conspiracy to Possess with the Intent to Distribute and Distribution of Cathinone and Cathine (KHAT))

That from sometime in or about 2015, and continuously thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]
Melik B. Ebrahim
[REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture, distribute and

possess with the intent to distribute a mixture or substance containing a detectable amount of cathinone and cathine (KHAT), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

Count Two

Violation: 21 U.S.C. § 841(a)(1)
(Possession with the Intent to Distribute
and Distribution of KHAT)

That from sometime in or about 2015, and continuously thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]
Melik B. Ebrahim
[REDACTED]

defendants, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cathinone and cathine (KHAT), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 841(a)(1).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE
Criminal Forfeiture Pursuant to 21 U.S.C. § 853

As a result of committing the offenses charged in this First Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 846, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived

from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

Substitute Assets

Moreover, if, as a result of any act or omission of any defendants, any property subject to forfeiture:

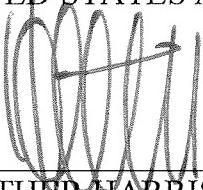
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

The United States intends to seek forfeiture of any other property of the defendants up to the value of the forfeitable property, including but not limited to all property, both real and personal owned by the defendants. As a result of the commission of the offenses alleged in this First Superseding Indictment, any and all interest that the defendants has in any such property is vested in and forfeited to the United States.

A TRUE BILL

LM
GRAND JURY FOREPERSON

JOSEPH D. BROWN
UNITED STATES ATTORNEY



HEATHER HARRIS RATTAN
Assistant United States Attorney

12/11/19

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

§§§§§§§§

SEALED

V.

No. 4:19CR271
Judge Jordan

MELIK B. EBRAHIM (2)

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846

Penalty: Not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least 5 years;

Special Assessment: \$100.00

Count Two

Violation: 21 U.S.C. § 841(a)(1)

Penalty: Not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least 5 years;

Special Assessment: \$100.00

AO 442 (Rev. 11/11) Arrest Warrant

09/30/2019
JC

11040430

UNITED STATES DISTRICT COURT

for the

Eastern District of Texas

United States of America

v.

MELIK B. EBRAHIM (2)

Case No. 4:19-cr-271 (Mazzant)

4:20-MJ-0076

Defendant

RECEIVED
 UNITED STATES MARSHAL
 E/TX-SHERMAN
 2019 DEC 12 A 9:15

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Melik B. Ebrahim

who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute and Distribution of Cathinone and Cathine (KHAT))
 21 U.S.C. § 841(a)(1) (Possession with the Intent to Distribute and Distribution of KHAT)

Date: 12/11/2019

David A. O'Toole

Issuing officer's signature

City and state: Sherman, Texas

David A. O'Toole, Clerk Eastern District of Texas

Printed name and title



Return

This warrant was received on (date) _____, and the person was arrested on (date) _____, at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title